

**UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
LINDA VALENTINE	:	
	:	NO. 17-14700-elf
DEBTORS	:	
	:	

**ANSWER IN OPPOSITION TO THE MOTION FOR RELIEF FROM THE STAY
OF SPECIALIZED LOAN SERVICING, LLC**

NOW COMES, Linda Valentine (“Debtor”), by their attorney of record, and Answers the Motion of Specialized Loan Servicing, LLC (“Specialized”) and states as follows:

1. Admitted in part and denied in part. It is admitted Specialized filed the Motion. It is denied that Specialized is entitled to relief from the stay.

2. Admitted that Debtor owns the property in question.

3. Denied. It is denied that “Movant” is the holder of the mortgage.

Denied. It is denied that “Movant” or FV-1, Inc. is a valid holder of the note. Moreover, the allonge to the Note is incorrect and upon information and belief, was not part of the Note. There is no explanation as to how this company has standing or a power of attorney to sign on behalf of the mortgagee. Specialized fails to trace the assignments of the alleged debt to establish the owner of the debt or that it has standing to enforce the debt.

4.

5. Admitted.

6. Admitted.

7. Denied. The mortgage company returned Debtor’s checks.

8. Denied. Strict proof is demanded.

9. Denied.

10. Denied.

WHEREFORE, it is respectfully request that the Motion for Relief from the Stay be Denied.

Dated November 27, 2017

/s/ Robert J. Birch

Robert J. Birch, Esquire
Id. No. 65816
617 Swede Street
Norristown, PA 19401
(610) 277-9700

CERTIFICATE OF SERVICE

I, Robert J. Birch, Esquire, hereby certify that on November 27, 2017, I served Debtors' Answer to the Motion for Relief from the Stay to all counsel and the U.S. Trustee via ECF.

/s/ Robert J. Birch

ROBERT J. BIRCH